

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN RE INTEL CORPORATION ) MDL Docket No. 05-MD-1717-JJF  
MICROPROCESSOR ANTITRUST ) Civil Action No. 1:05-CV-00485-JJF  
LITIGATION )

[PROPOSED] ORDER FOR CONSOLIDATION  
OF ALL PURCHASER ANTITRUST ACTIONS AND  
APPOINTMENT OF PLAINTIFFS' CO-LEAD AND LIASION COUNSEL

IT IS HEREBY ORDERED for all purchaser antitrust actions in MDL No. 1717:

**I. CONSOLIDATION OF THE ACTIONS**

Consistent with the JMPL Transfer Order for Docket No. 1717, dated Nov. 8, 2005, this Court will consolidate all purchaser antitrust actions pending against Intel Corporation (“Intel”) for pretrial purposes (collectively “Centralized Actions”).

**II. LEADERSHIP ORGANIZATION OF PLAINTIFFS' COUNSEL**

- A. The organizational structure regarding co-lead plaintiffs' counsel established by this Order shall be applicable to the Centralized Actions;
- B. The firms of Cohen, Milstein, Hausfeld & Toll, P.L.L.C.; the Furth Firm LLP; Hagens Berman Sobol & Shapiro LLP, and Saveri & Saveri, Inc., shall serve as co-lead plaintiffs' counsel (hereinafter “Co-Lead Counsel”);
- C. Co-Lead Counsel shall have the following responsibilities and duties:
  1. To brief and argue motions, either personally or through counsel whom they designate;
  2. To decide strategy;
  3. To receive monthly time reports from plaintiffs' counsel, set assessments, and allocate fees;

4. To initiate and conduct discovery, either personally or through counsel whom they designate;
5. To act as spokesperson at pretrial conferences, either personally or through counsel whom they designate;
6. To negotiate with defense counsel with respect to settlement and discovery-related issues; and
7. To perform such other duties as they deem necessary.

D. Co-Lead Counsel shall make all work assignments in such a manner as to conduct this litigation in an orderly and efficient manner and to avoid unnecessary duplication and unproductive effort.

E. The firm of Prickett, Jones & Elliott, P.A. shall serve as Liaison counsel.

F. Liaison counsel shall be responsible for maintaining and distributing an up-to-date service list, distributing to all plaintiffs' counsel Court Orders, pleadings, and other documents in the Centralized Actions, and performing assignments as requested by Co-Lead Counsel.

SO ORDERED THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2005.

BY THE COURT:

JOSEPH J. FARNAN, JR.  
UNITED STATES DISTRICT JUDGE